

REMARKS/ARGUMENTS

A. Summary of the Amendments

The application still contains 39 claims.

No amendments have been made to the claims.

B. Statements of Rejection under 35 USC §102e)

In the Office Action, the Examiner has rejected claims 1-39 under 35 U.S.C. §102(e) as being anticipated by US Patent 6,144,726 (hereafter to be referred to as Cross).

For the reasons presented below, the Applicant respectfully disagrees with the Examiner's rejection and submits that Cross neither teaches nor suggests the subject matter of claims 1-39.

Brief description of Cross and General Comments

Cross pertains to a telecom access billing system providing the capability for a communication carrier service provider to substantially automate the payment to other communication carrier service providers for the use of their services and equipment. More specifically, the system described in Cross allows an entity receiving bills to automatically manage the payment of these bills including tracking bills for which the amounts are being disputed. The system in Cross is therefore associated with the customer and assists a customer in managing incoming bills to be paid. In Cross, when a bill is being disputed, a dispute report associated to the bill can be generated and sent to the biller to be dealt with at a later time. The manner in which the dispute is handled at the biller end is not described in any way in Cross. Actually, Cross does not look at the biller's side of the exchange at all in its system and does not address the problem of

managing a dispute from the biller's side. See column 12 lines 51-56, which is reproduced below for the Examiner's convenience:

"In the case where there has been a dispute and the bill has been short paid, *the vendor receives the dispute report which then can be further negotiated with the customer at a later time*. Once this dispute report is resolved, as was described above, the dispute report then can be closed as was described above."

As such, the applicant submits that the problem addressed in Cross is completely different from the problem addressed in the instant application. Cross views the problem from the customer's end in terms of bills to be paid. Cross provides a system for managing the payment of bills from the customer's end and for tracking disputes between the customer and one or more suppliers which issue bills.

The problem addressed in the present application is significantly different. The present application is concerned with the problem of tracking, from a biller's perspective, invoices to be paid and disputes and for facilitating communication and interaction between customers and the biller. More specifically, the instant application views the problem from the biller's end in terms of invoices to be paid and provides a system for managing the payment of invoices from the biller's end and for managing disputes between the biller and one or more customers. It provides a system allowing the biller to address disputes and to view reasons a prior invoice was disputed by a customer entity. The system in the present application is therefore associated with the biller and assists the biller in managing the bills for which payment is to be received. The applicant submits that this problem is not addressed in any way by Cross.

Claim 1

Claim 1 reads as follows:

1) *A computer readable storage medium containing a program element for execution by a biller computing apparatus residing in a data network for implementing an electronic invoice management system, comprising:*

a) *an invoice generation unit operative for producing data files representative of invoices issued by a biller to respective customer entities;*

- b) *a dispute resolution unit in communication with a dispute history data structure holding a plurality of groups of records, each record being descriptive of reasons a prior invoice produced by the invoice generation unit was disputed by a customer entity, each group of records being associated to a corresponding customer entity;*
- c) *said dispute resolution unit being responsive to a message received from a first customer computing unit over the data network and representative of reasons to dispute a new invoice submitted by a given customer entity to:*
 - i) *locate the group of records in the dispute history data structure corresponding to the given customer entity;*
 - ii) *create a record from the message representative of reasons to dispute the new invoice from the given customer entity and store the created record in the dispute history data structure.*

The applicant respectfully submits that the subject matter of claim 1 is neither taught nor suggested by the document cited by the Examiner. Without limiting the generality of the foregoing, the applicant submits that the document cited by the examiner neither teaches nor suggests the above-emphasized features of claim 1.

Firstly, the system described in Cross is associated with the customer to assist the latter in processing incoming bills including managing disputes associated to the bills. As indicated above, the manner in which the dispute is handled at the biller end is not described in any way in Cross. Conversely, the claimed invention pertains to a computer readable storage medium containing a program element **for execution by a biller computing apparatus** as indicated in the preamble of claim 1.

Secondly, Cross does not provide a plurality of groups of records, each record being descriptive of reasons a prior invoice produced by the invoice generation unit was disputed by a customer entity, *each group of records being associated to a corresponding customer entity*. In Cross, since the system operates at the customer location (or the billed entity) all the records are associated to a same customer. Any record which would describe a dispute in Cross would be associated to a bill and a biller entity. Conversely, claim 1 requires that each group of records from a plurality of groups of records be associated to a corresponding customer entity. As such, the applicant submits that the feature:

a dispute resolution unit in communication with a dispute history data structure holding a plurality of groups of records, each record being descriptive of reasons a prior invoice produced by the invoice generation unit was disputed by a customer entity, each group of records being associated to a corresponding customer entity;

is neither taught nor suggested by the cited document.

Thirdly, in the system described in Cross neither the dispute tracking module 20 (figure 1) nor the invoice and dispute report output 17 are responsive to a message received from a customer computing unit over a data network. Again, the system in Cross is implemented at the customer location and therefore does not receive messages from a customer computing unit over a data network. Conversely, claim 1 requires that the system comprise *a dispute resolution unit responsive to a message received from a first customer computing unit over the data network and representative of reasons to dispute a new invoice submitted by a given customer entity*. As such, the applicant submits that the above feature is neither taught nor suggested by the document cited by the examiner.

Fourthly, in the system described in Cross, neither the dispute tracking module 20 (figure 1) nor the invoice and invoice and dispute report output 17 are responsive to a message received from a customer computing unit over a data network to:

- (1) locate the group of records in the dispute history data structure corresponding to the given customer entity;*
- (2) create a record from the message representative of reasons to dispute the new invoice from the given customer entity and store the created record in the dispute history data structure.*

This is simply not present anywhere in Cross. Conversely, claim 1 requires:

- d) *said dispute resolution unit being responsive to a message received from a first customer computing unit over the data network and representative of reasons to dispute a new invoice submitted by a given customer entity to:*
 - i) *locate the group of records in the dispute history data structure corresponding to the given customer entity;*
 - ii) *create a record from the message representative of reasons to dispute the new invoice from the given customer entity and store the created record in the dispute history data structure.*

As such, the applicant submits that the above feature is neither taught nor suggested by the document cited by the examiner.

In light of the above, the applicant respectfully submits that the subject matter of claim 1 is neither anticipated nor rendered obvious by Cross and submits that claim 1 is in patentable form.

Claims 2- 14

Claims 2-14 depend directly or indirectly from 1 and as such incorporate by reference all its limitations. As such, the Applicant respectfully submits that claims 2-14 are neither anticipated nor rendered obvious by the document cited by the Examiner.

Claim 15

Claim 15 reads as follows:

15) *An electronic invoice management system, comprising:*

- a) *a biller machine;*
- b) *a customer computing unit;*
- c) *a data network interconnecting said biller machine to said customer computing unit;*
- d) ***said biller machine including:***
 - i) *an invoice generation unit operative for producing data files representative of invoices issued by a biller to respective customer entities;*
 - ii) ***a dispute resolution unit in communication with a dispute history data structure holding a plurality of groups of records, each record being descriptive of reasons a prior invoice produced by the invoice generation unit was disputed by a customer entity, each group of records being associated to a corresponding customer entity;***
 - iii) ***said dispute resolution unit being responsive to a message received from said customer computing unit over said data network and representative of reasons to dispute an invoice submitted by a given customer entity to:***
 - (1) *locate the group of records in the dispute history data structure corresponding to the given customer entity;*
 - (2) *create a record from the message representative of reasons to dispute an invoice from the given customer entity and store the created record in the dispute history data structure.*

The applicant respectfully submits that the subject matter of claim 15 is neither taught nor suggested by the document cited by the Examiner. Without limiting the generality of the foregoing, the applicant submits that, for reasons similar to those set forth with respect to

claim 1, the document cited by the examiner neither teach nor suggests the above emphasized features of claim 15.

In light of the above, the applicant respectfully submits that the subject matter of claim 15 is neither anticipated nor rendered obvious by Cross and submits that claim 15 is in patentable form.

Claims 16-26

Claims 16-26 depend directly or indirectly from 15 and as such incorporate by reference all its limitations. As such, the Applicant respectfully submits that claims 16-26 are neither anticipated nor rendered obvious by the document cited by the Examiner.

Claim 27

Claim 27 reads as follows:

- 27) *A method for electronic invoice management comprising:*
- a) *generating at a biller machine data files representative of invoices issued by a biller to respective customer entities;*
 - b) *providing a data structure holding a plurality of groups of records, each record being descriptive of reasons a prior invoice generated at the biller machine was disputed by a customer entity, each group of records being associated to a corresponding customer entity;*
 - c) *in response to a message to the biller machine issued by a customer computing unit and representative of reasons to dispute an invoice submitted by a given customer entity:*
 - i) *locating in the data structure the group of records corresponding to the given customer entity;*
 - ii) *creating a record from the message representative of reasons to dispute an invoice from the given customer entity and storing the created record in the dispute history data structure.*

The applicant respectfully submits that the subject matter of claim 27 is neither taught nor suggested by the document cited by the Examiner. Without limiting the generality of the foregoing, the applicant submits that, for reasons similar to those set forth with respect to

claim 1, the document cited by the examiner neither teach nor suggests the above emphasized features of claim 27.

In light of the above, the applicant respectfully submits that the subject matter of claim 27 is neither anticipated nor rendered obvious by Cross and submits that claim 27 is in patentable form.

Claims 28-38

Claims 28-38 depend directly or indirectly from 27 and as such incorporate by reference all its limitations. As such, the Applicant respectfully submits that claims 28-38 are neither anticipated nor rendered obvious by the document cited by the Examiner.

Claim 39

Claim 39 reads as follows:

39) *An electronic invoice management system comprising:*

- a) *means for producing data files representative of invoices issued by a biller to respective customer entities;*
- b) *dispute handling means in communication with a dispute history data structure holding a plurality of groups of records, each record being descriptive of reasons a prior invoice produced by the means for producing was disputed by a customer entity, each group of records being associated to a corresponding customer entity;*
- c) *said dispute handling means being responsive to a message received from a first customer computing unit over the data network and representative of reasons to dispute a new invoice submitted by a given customer entity to:*
 - i) *locate the group of records in the dispute history data structure corresponding to the given customer entity;*
 - ii) *create a record from the message representative of reasons to dispute the new invoice from the given customer entity and store the created record in the dispute history data structure.*

The applicant respectfully submits that the subject matter of claim 39 is neither taught nor suggested by the document cited by the Examiner. Without limiting the generality of the foregoing, the applicant submits that, for reasons similar to those set forth with respect to

claim 1, the document cited by the examiner neither teach nor suggests the above emphasized features of claim 39.

In light of the above, the applicant respectfully submits that the subject matter of claim 39 is neither anticipated nor rendered obvious by Cross and submits that claim 39 is in patentable form.

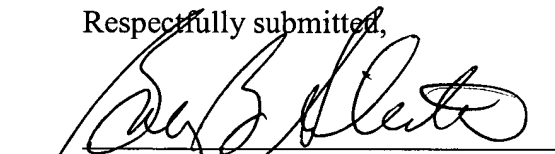
CONCLUSION

It is respectfully submitted that claims 1-39 are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance of claims 1-39 at an early date is solicited.

If the claims of the application are not considered to be in full condition for allowance, for any reason, the Applicant respectfully requests the constructive assistance and suggestions of the Examiner in drafting one or more acceptable claims or in making constructive suggestions so that the application can be placed in allowable condition as soon as possible and without the need for further proceedings.

To the extent necessary, a petition for an extension of time under 37 C.F.R. §1.136 is hereby made. To the extent additional fees are required, please charge the fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 02-1010 (32423/82537) and please credit any excess fees to such deposit account.

Respectfully submitted,


Bobby B. Gillenwater
Reg. No. 31,105
Direct Line (260) 425-4649

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